BOOKING HOLDINGS

Anti-Bribery and Corruption Policy

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INTRODUCTION

At Booking Holdings Inc. and our Brands (individually a "Brand" and collectively the "Company" or "BKNG"), we are committed to conducting business relationships with integrity and have zero tolerance for any form of bribery or corruption.

PURPOSE

The purpose of this Policy is to help ensure that we comply with all applicable anti-bribery and corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

SCOPE

This Policy applies to all employees, contractors, consultants, officers, and directors across the Company. The restrictions also extend to third parties working for or on behalf of the Company.

> Never ask or allow a third party to do what you cannot under this Policy.

DEFINITIONS OF KEY TERMS

For purposes of this Policy, the following definitions apply:

BRIBE

Anything of value offered, given, received, or accepted to influence or reward a decision or action. For example:

- A tax advisor offers a payment to an auditor in an attempt to get favorable tax treatment for a client
- A VP offers a high-paying job to the daughter of the minister of tourism who negotiates contracts, even though the daughter is not qualified for the job
- A hotel developer gives a high-paying job to the son of a government official who approved the building plans for a project, even though the son is not qualified for the job
- An account manager takes employees of a state-owned airline to a dinner at a Michelin-starred restaurant while negotiating a renewal contract
- An account executive offers an expensive bottle of wine to a celebrity chef and owner of a top-tier restaurant in order to secure a deal
- An employee accepts concert tickets from a supplier in exchange for onboarding the supplier in circumvention of the usual procurement process
- An employee offers their manager a weekend stay at their beach house in an attempt to get a promotion or favorable year-end review
- An employee buys a government official, with whom they have a professional relationship, an expensive birthday present to engender goodwill for the Company.

KICKBACK

Returning or "kicking back" a portion of improper gains to compensate or reward another party who helped facilitate a deal in an unauthorized or unethical manner. For example:

- A supplier charges higher-than-market prices for goods delivered, with the understanding that a portion of the excess profits will be paid back to the employee in the company who approved the supplier contract
- A travel and events company agrees to pay a portion of the profits from referred customers to individuals associated with business partners who steer customers to their company
- A sales representative agrees to give a portion of their commission to the owner or representative of a customer/vendor company in exchange for signing the contract

GOVERNMENT OFFICIAL

A "Government Official" includes the following:

- Any person acting in an official capacity on behalf of a national, state, or local government agency, department, or regulatory authority (e.g., members of parliament, tourism ministry officials, police officers, tax authorities, customs inspectors, immigration officers)
- An employee of state- or government-owned or controlled enterprises (e.g., national airlines, government-owned hotels, state-owned media organizations, government-affiliated destination management organizations, state-owned or regulated tourist attractions, museums, or historical sites)
- A candidate for political office or any political party or representative
- A private person acting temporarily in an official capacity for or on behalf of any government entity (e.g., an advisor to a government ministry or agency)
- A member of a government-appointed committee or panel
- A member of a ruling or royal family where the family may be responsible for executive, legislative, or judicial decisions
- An employee of a sovereign wealth fund or sovereign development fund (e.g., China Investment Corporation, Abu Dhabi Investment Authority, Qatar Investment Authority, Singapore Government Investment Corporation)
- An employee of a foreign embassy or consulate
- An employee or representative of a quasi-public international organization (e.g., United Nations, Red Cross, FIFA Committee, International Olympic Committee, World Bank)
- An immediate family member of any of the above (e.g., the spouse of the Minister of Tourism)

ANYTHING OF VALUE

"Anything of value" includes cash or anything else of value to the recipient, tangible or intangible, such as:

- Cash equivalents, vouchers, certificates, and gift cards
- Discounts
- Gifts, entertainment, and hospitality
- Travel expenses or hosted travel
- Business opportunities
- Preferential contract terms or other favors
- Finders' fees
- Stock options
- Event sponsorships
- Political contributions
- Charitable donations
- Job offers
- Scholarships

> Consult our Gifts & Entertainment Policy for further restrictions on the exchange of gifts and entertainment with the third parties with whom we do business.

BOOKS AND RECORDS

"Books and records" means all books and records, ledgers, employee records, customer lists, files, correspondence, and other records of any kind (whether written, electronic, or in another format) owned or used by the Company, or in which the Company's assets, business, or transactions are otherwise reflected. Common examples of "books and records" include:

- Expense reports
- Invoices
- Time records
- Financial reports
- Personnel files
- Business plans
- Contracts
- Customer lists

THIRD PARTY

"Third party" means any individual or organization outside the Company with whom you interact in connection with your work for the Company, including a current or prospective:

- Partner
- Customer
- Supplier
- Vendor
- Agent
- Consultant
- Lobbyist

FACILITATING PAYMENT

Also known as an "expediting payment," this is a small, nominal payment made to a government official to expedite or facilitate routine, non-discretionary activities, such as:

- Processing permit or license applications
- Processing visas
- Clearing goods through customs
- Providing police protection
- Providing phone or mail service
- Supplying utilities

POLICY REQUIREMENTS

BRIBERY & CORRUPTION

In your work for or on behalf of the Company, you must not offer, promise, give, authorize, request, or accept anything of value to or from a third party (including government officials and private parties) to obtain or retain business or gain influence, favorable treatment, or any other advantage for the Company.

Improper Influence can be used to try to:

- Win a contract
- Guarantee faster delivery
- Avoid import restrictions
- Reduce duties, taxes, or penalties
- Influence litigation
- Circumvent procurement policies
- Get exemptions from regulatory requirements
- Expedite an approval or permitting process
- Affect the outcome of a government decision

You must also avoid any actions that could create the appearance of bribery or corruption.

GIFTS, MEALS, AND ENTERTAINMENT INVOLVING GOVERNMENT OFFICIALS

Gifts, meals, and entertainment require special caution when government officials are involved due to the increased potential for bribery and corruption. For this reason, you must obtain written approval from the Compliance & Ethics Department before offering, promising, giving, authorizing, requesting, or accepting anything of value to or from a government official.

BOOKS & RECORDS AND INTERNAL CONTROLS

We are all responsible for maintaining accurate books and records and ensuring that our internal controls are effective. Every one of us plays an important role in helping to ensure that our books and records are accurate, reflecting transactions in a timely manner and in reasonable detail. False, misleading, incomplete, inaccurate, or artificial entries are strictly prohibited and could result in significant fines or penalties.

If you have any concerns about the accuracy of the Company's books and records — or that anyone is inadvertently or intentionally circumventing our internal controls — you must immediately raise your concerns.

DO Confirm that any payment that you make or approve is recorded with sufficient detail to show the purpose and nature of the transaction (e.g., service provided, names, dates, and amounts), approvals received, and a clear business justification.

DON'T Request that any third party submit a record that does not accurately reflect the substance of the transaction.

COMMON RISK AREAS

Third Parties

Our employees are not the only ones who can expose us to violations of anti-bribery and corruption laws. These laws also prohibit the Company from employing third parties to make improper payments on our behalf. The Company is responsible for such payments where it can be reasonably concluded that the Company knew or should have known that the payments would be made.

It is important that our third parties understand that they are prohibited from paying or receiving bribes (including facilitating payments) on our behalf. As such, all of the Company's third parties who act on our behalf must be vetted, undergo due diligence, and be made aware of the Company's expectation that they abide by relevant anti-bribery and corruption laws. Please work with the Compliance & Ethics Department to ensure that our third parties are appropriately vetted prior to carrying out any work for or on behalf of the Company.

Below are red flags to look out for in your interactions with third parties. If you encounter any of the following red flags, contact the Compliance & Ethics Department.

Reputational issues

- Will not cooperate with due diligence screening requests
- Has been accused of improper business practices such as fraud, embezzlement, bribery, corruption, or any other act of dishonesty
- Has a reputation for paying or demanding bribes, or is known for having a special or close affiliation with a government official

Unusual contract or payment terms

- Refuses to include anti-bribery or anti-corruption terms in a written agreement
- Insists on the use of side letters, or refuses to put terms in writing
- Refuses to sign a formal commission or fee agreement
- Asks for a commission or fee payment before signing a contract or carrying out a government function or process
- Wants payment in cash
- Asks for payment to be forwarded to a country or geographic location different from where the party is located or conducts business, or to a party different than the contracting party
- Asks for unusual or "off the books" fees to facilitate a service

Unusual invoicing practices

- Won't provide an invoice or receipt for payments that were made
- Submits an invoice that:
  - Appears to have been altered, faked, or manufactured
  - Is not fully justified with back-up documentation

– Contains line items that are vague or do not appear to have a real business purpose, such as "special" or "administrative" fees

– Is not consistent with the terms of the written agreement or includes a commission or fee that appears excessive in light of services rendered

Suspicious actions, demands, or connections

- Offers unusually generous gifts or lavish hospitality to the Company
- Asks for lavish entertainment or gifts before beginning or continuing contract negotiations or providing services
- Implies that a "donation" to a specific charity will help ensure that a business deal goes through
- Wants you to give a job or some other advantage to a friend or relative
- Insists on using an unfamiliar agent, intermediary, or consultant

Trust your instincts. If something doesn't feel right, it probably isn't.

Cash Payments

As a general rule, no cash payments are allowed. In an unusual circumstance that necessitates a disbursement from petty cash, the payment must be documented, supported by signed receipts, and pre-approved in writing by the Compliance & Ethics Department.

Donations and Sponsorships

All donations and sponsorships made on behalf of the Company and with Company resources must be pre-approved by your Compliance & Ethics Department. Upon receiving your request via your Brand's Donations and Sponsorships disclosure form, your Compliance & Ethics Department will facilitate the required due diligence and approve as appropriate.

Personal Donations and Payments

You may not use personal funds to accomplish what is prohibited under this Policy. Consult with the Compliance & Ethics Department before making a personal donation or payment to a third party that is in a position to influence a decision impacting the Company. While donations to charitable organizations ordinarily are regarded as good corporate citizenship, those made to government officials or private parties with whom we do business can raise concerns under anti-bribery and corruption laws. Political contributions from Company funds or resources are separately addressed in our BKNG Political Contributions Policy.

Facilitating Payments and Personal Safety Payments

Facilitating payments are not allowed under this Policy. Although facilitating payments may be customary and accepted business practices in certain parts of the world, they are illegal in most countries. The one exception to this rule is for personal safety payments (i.e., payments made to avoid imminent physical harm or to ensure the personal safety of an individual). If you are under duress or imminent danger of physical harm and a facilitating payment will ensure your personal safety, you can make the payment, provided you report the situation to your manager and Compliance & Ethics Department once you are safe. You must also ensure that the payment is accurately reflected in the Company's books and records as a personal safety payment.

RELATED POLICIES AND PROCEDURES

Please see the below list of related policies and procedures:

- Code of Conduct
- Gifts & Entertainment Policy
- Political Contributions Policy
- Supplier Code of Conduct
- Anti-Retaliation Policy

This Policy is further supported by the Company's processes and internal controls, including education and awareness; risk assessments; third party due diligence; reporting, escalation, and investigation procedures; and ongoing monitoring.

RAISING CONCERNS AND SEEKING ADVICE

If you become aware of a potential violation of this Policy or need advice on how to handle a situation, you are responsible for promptly reaching out to the Compliance & Ethics Department, your manager, or the Compliance Helpline. We have a zero-tolerance stance prohibiting retaliation against anyone who raises a concern in good faith. You are also protected from adverse action for refusing to give or accept a bribe, even if this decision negatively affects revenue, sales, or other aspects of our business. For further information on non-retaliation protections, please consult our Anti-Retaliation Policy.

ENFORCEMENT

Any action in breach of this Policy may expose your Brand and/or BKNG to legal and/or regulatory action, adverse publicity, and negative business impact. Violations of anti-bribery and corruption laws are very serious and can lead to significant civil penalties and damage awards, as well as fines and imprisonment in criminal proceedings for any employees, officers, or directors involved.

Failure to comply with this Policy may result in disciplinary action in accordance with the Code of Conduct, up to and including termination of employment.

REVISION HISTORY

Effective Date	Revision Type	Description of Change/Review
Adopted October 1, 2018	–	–
July 23, 2026	Stylistic/Clarifying Update	Updates to enhance clarity, align with the Code of Conduct, and standardize formatting with other BKNG policies.